

4. The Defendant submitted the monthly contribution reports and payment but failed to pay the liquidated damages, attorney fees and costs.. (Exhibit B, affidavit of John Libby)

5. The Defendant owes liquidated damages on the unpaid ERISA contributions in the amount of \$1,724.48 for the period April 2013 through February 2014 pursuant to the Collective Bargaining Agreements, the Trust Agreements and 29 U.S.C. §1132(g)(2)(C)(ii). (Exhibit B)

6. The Defendant owes the sum of \$5,422.00 for necessary and reasonable attorney fees and costs of \$400.00 which are collectible under the terms of the Collective Bargaining Agreement, the Trust Agreements and 29 U.S.C. §1132(g)(2)(D). (Exhibit C, affidavit of Daniel P. McAnally)

WHEREFORE, Plaintiffs pray that their motion for entry of judgment be granted in the amount of \$7,546.48.

Respectively submitted,

s/ DANIEL P. McANALLY  
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